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IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

SHERRY HANSON AND STEVEN
HANSON, husband and wife,

Plaintiffs,

vs.

CITY OF SEATTLE, a governmental entity,
UNITED STATES POSTAL SERVICE, a
governmental entity , and UNITED
STATES GENERAL SERVICES
ADMINISTRATION, a governmental
agency,

Defendants.

No.

COMPLAINT FOR PERSONAL
INJURIES

Come now Plaintiffs Sherry Hanson and Steven Hanson, by and through
their attorney of record, Paul Wallstrom of Wallstrom Law offices, and allege:

COMPLAINT FOR
PERSONAL INJURIES - 1

WALLSTROM LAW OFFICES
1734 NW MARKET STREET
SEATTLE, WA 98107
Phone: (206) 420-0180
Fax: (206) 407-3798
Fax: (206) 600-2917
WALLSTROM@PAULWALLSTROM.COM
WEBSITE: PAULWALLSTROM.COM

1 **PLAINTIFFS**

2 1.

3 At all times relevant hereto, Plaintiffs Sherry Hanson and Steven
4 Hanson were and are married persons and residents of Sarasota, Florida.
5

6 **JURISDICTION AND VENUE**

7 2.

8
9 The Court has jurisdiction over this action against the United States
10 agencies under 28 U.S.C. §1346 (b)(1). The appropriate venue for this case for
11 the claims against the agencies of the United States under 28 U.S.C. §1402 is the
12 Western District of the Federal District Court of the State of Washington. The
13 Court has supplemental jurisdiction over defendant City of Seattle pursuant to 28
14 U.S.C. § 1367.
15

16 **DEFENDANTS**

17 3.

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19 This action is brought against the United States of America under 28
20 U.S. C. §2674 and against the City of Seattle under Chapter 4.92 RCW.
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25 COMPLAINT FOR
26 PERSONAL INJURIES - 2

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1 **NEGLIGENCE**

2 4.

3 On June 19, 2009, Plaintiff Sherry Hanson was injured in a fall which
4 occurred when she stepped in an unmarked hole in the sidewalk outside the
5 United States Postal Service facility at 909 First Avenue, City of Seattle, County of
6 King, State of Washington. The United States Postal Service operated the facility
7 immediately adjacent to the sidewalk hole in which Plaintiff Sherry Hanson fell.
8 The United States General Services Administration was the landlord of the United
9 States Postal Service for the facility. The hole in the sidewalk was unreasonably
10 dangerous. Each of the Defendants knew or should have known that the hole
11 would cause injuries to those persons walking on the sidewalk for which
12 negligence Defendants are liable to Plaintiffs for their damages. The Defendants
13 were negligent for allowing the defective construction and/or maintenance of the
14 sidewalk outside the United States Postal Service facility.
15
16

17 **DAMAGES**

18 5.

19
20 5.1 As a direct and proximate result of the accident described
21 herein and as a direct and proximate result of the negligent acts and omissions of
22 the Defendants, Plaintiff Sherry Hanson has suffered pain, mental and physical
23 anguish, and continued physical disability since June 19, 2009.
24

25 COMPLAINT FOR
26 PERSONAL INJURIES - 3

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1 5.2 As a further direct and proximate result of Defendants'
2 negligence, Plaintiff Sherry Hanson has suffered significant monetary losses
3 resulting from the impairment of her earning capacity and her inability to carry out
4 normal day-to-day work, family and recreational activities that she enjoyed prior to
5 the accident in question.

6 5.3 As a further direct and proximate result of the Defendants'
7 negligence, Plaintiffs have expended and will be compelled to expend significant
8 amounts of money for medical, hospital and related medical services in an effort to
9 regain Plaintiff Sherry Hanson's health and her normal physical condition that
10 existed prior to the accident in question, the exact extent of which is currently
11 unknown, but will be further established and proven at the time of trial.

12 5.4 As a further direct and proximate result of the negligence of the
13 defendants, Plaintiff Sherry Hanson has become permanently physically disabled.
14

15 5.5 As a further direct and proximate result of the negligence of
16 Defendants, Plaintiffs have suffered other pecuniary losses in amounts currently
17 unknown, but to be proven and established at the time of trial.
18

19 5.6 As a further direct and proximate result of the negligence of
20 Defendants, Plaintiff Steven Hanson has suffered loss of consortium in an amount
21 currently unknown, but to be proven and established at the time of trial.
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1 7.3 Past and future medical expenses;

2 7.4 Past and future income loss;

3 7.5 The resulting decrease in Plaintiff Sherry Hanson's quality of life
4 which has resulted from the physical restrictions and impairment which have
5 adversely affected plaintiff's social, family, recreational and career objectives;

6 7.6 Loss of consortium;

7 7.7 Plaintiff's allowable attorney's fees and costs of suit; and

8 7.8 For such other and further relief as the court deems just and
9 equitable.
10

11 Dated this 27th day of October 2011.

12
13
14 s/Paul Wallstrom
15 WSBA No. 8605
16 Wallstrom Law Offices
17 1734 NW Market Street
18 Seattle, WA 98107
19 Telephone: (206) 420-0180
20 Fax: (206) 600-2917
21 Email: Wallstrom@PaulWallstrom.com
22 Attorney for Plaintiffs
23
24

25 COMPLAINT FOR
26 PERSONAL INJURIES - 6

WALLSTROM LAW OFFICES
1734 NW MARKET STREET
SEATTLE, WA 98107
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WEBSITE: PAULWALLSTROM.COM